

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA CITY, IOWA,
et al.,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

(Jointly Administered)

**STATEMENT OF CORRECTION REGARDING
MOTION OF ALTERA DIGITAL HEALTH INC. TO
COMPEL ASSUMPTION OR REJECTION OF EXECUTORY CONTRACT**

Altera Digital Health Inc. (“Altera”), by and through its undersigned counsel, hereby files this statement of correction to the *Motion of Altera Digital Health Inc. to Compel Assumption or Rejection of Executory Contract* [Docket No. 589] (the “Motion”) as well as the *Declaration of Elliott Bryant in Support of Motion of Altera Digital Health Inc. to Compel Assumption or Rejection of Executory Contract* [Docket No. 589-6] (the “Declaration”).

1. It has come to Altera’s attention that incorrect dollar amounts are contained in the Motion and the Declaration, both of which Altera hereby amends, restates, supersedes, and corrects as follows:¹

2. The correct amount due to Altera from the Debtors from August 7, 2023 (the “Petition Date”) through December 15 is \$2,017,684.41. Paragraph 9 of the Motion misstated that Altera is owed “almost \$4 million” for this period. Likewise, Paragraphs 18 and 31 of the Motion, as well as Paragraphs 7 and 11 of the Declaration and Paragraph 3 of the proposed order stated and/or requested payment of \$3,932,754.64 for this period. These figures are hereby amended to state \$2,017,684.41.

¹ Altera also will file a corrected Motion and Declaration to ensure accuracy.

3. The actual amount that accrues and is unpaid by the Debtors each week sometimes varies, because of one-time items and other differences, but it is estimated that the outstanding amount at the end of January, 2024 will be \$1,600,114.41. Paragraph 31 of the Motion and Paragraph 11 of the Declaration, stated that the amount of unpaid weekly accruals was \$207,000. This amount is hereby amended to state that the actual amount that accrues and is unpaid by the Debtors each week sometimes varies and it is estimated that the outstanding amount at the end of January, 2024 will be \$1,600,114.41

Dated: January 12, 2024

Respectfully submitted,

PAPPAJOHN, SHRIVER, EIDE &
NIELSEN P.C.

/s/ Larry S. Eide
Larry S. Eide (AT0002317)
103 E. State Street, Suite 800
Mason City, IA 50401
Tel: (641) 423-4264
Fax: (641) 423-3145
eide@pappajohnlaw.com

-and-

LOEB & LOEB LLP
Schuyler G. Carroll (admitted *pro hac vice*)
345 Park Avenue
New York, NY 10154
Tel: (212) 407-4000
Fax: (212) 202-5431
scarroll@loeb.com

Counsel to Altera Digital Health Inc.